

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UMUOJI IMPROVEMENT UNION  
(NORTH AMERICA), INC.

Plaintiff

v.

Civil Action No.: 1:20-CV-12229

UMUOJI IMPROVEMENT UNION  
(NORTH AMERICA), INC., UMUOJI  
IMPROVEMENT UNION, MASSACHUSETTS,  
INC., VICTOR IDE OKOYE and OGOR OKOYE

Defendants

**PLAINTIFF'S REQUEST FOR LEAVE TO FILE REPLY TO DEFENDANTS' NOTICE TO  
COURT [DOC. #37]**

Pursuant to Local Rule 7.1(b)(3), plaintiff requests leave to file a brief reply to Defendants'  
Notice to Court Pursuant to the Court's Memorandum and Order on Plaintiff's motion for Preliminary  
Injunction Dated May 4, 2021 ("Notice"). A copy of the proposed Reply is submitted as Exhibit 1. As  
grounds for this motion, plaintiff wishes to address certain information provided by the defendants in  
their Notice.

Respectfully submitted,

UMUOJI IMPROVEMENT UNION  
(NORTH AMERICA), INC.,  
Plaintiff,

By its attorney,

/s/ Travis T. Pregent

Travis T. Pregent (BBO: 682998)

PREGENT LAW

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CERTIFICATION

I certify that I have served this document via Notice of Electronic Filing for parties and counsel on the date set forth below in accordance with the Federal Rules of Civil Procedure and this Court's Local Rules.

/s/ Travis T. Pregent  
Travis T. Pregent

Date: May 17, 2021